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8 **Attorney for Defendant,**  
9 **RICHARD O'CONNOR**

7 **UNITED STATES DISTRICT COURT**  
8  
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 **UNITED STATES OF AMERICA,** ) **CASE NO.: 8:23-CR-00027-DOC**  
11 )  
12 **Plaintiff,** ) **DEFENDANT'S EX PARTE**  
13 **vs.** ) **APPLICATION FOR ORDER**  
14 **RICHARD O'CONNOR,** ) **SEALING DEFENDANT'S**  
15 **Defendant.** ) **OBJECTIONS TO THE**  
16 ) **PRESENTENCE INVESTIGATION**  
17 ) **REPORT AND SENTENCING**  
18 ) **POSITION AND EXHIBITS;**  
19 ) **DECLARATION OF JOSEF SADAT**

20 **TO THE HONORABLE DAVID O. CARTER, UNITED STATES DISTRICT JUDGE, AND TO**  
21 **ASSISTANT UNITED STATES ATTORNEY, MELISSA RABBANI:**

22 **Defendant's counsel, Josef Sadat., hereby applies EX PARTE for an ORDER that**  
23 **DEFENDANT'S OBJECTIONS TO THE PRESENTENCE INVESTIGATION REPORT AND**  
24 **SENTENCING POSITION AND EXHIBITS, be filed under seal.**

25 **DATED: Dec. 8, 2023**

**LAW OFFICE OF JOSEF SADAT**

26 **By: /s/ Josef Sadat**  
27 **JOSEF SADAT, Esq.**  
28 **Attorney for Defendant,**  
**Richard O'Connor**

**DECLARATION OF JOSEF SADAT**

Josef Sadat hereby declares:

1. That I am the attorney of record for Defendant, Richard O'Connor. The matters contained herein are true within my own personal knowledge and if called to testify to same, I could and would competently do so.
2. Declarant requests to seal the Defendant's Objections to the Presentence Investigation Report and Sentencing Position and Exhibits because it discusses Defendant's private medical records as well as confidential information surrounding his three minor children.
3. Defense counsel notified AUSA Melissa Rabbani of this request on December 7, 2023 and she stated that she has no objection.

I declare the foregoing to be true and correct under the penalty of perjury. Executed at Los Angeles California on Dec. 8, 2023.

\s\ Josef Sadat  
Josef Sadat